

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Cynthia Ann Schmidt
Woodrow Paul Schmidt JR
Debtor(s)

Chapter 13

Lakeview Loan Servicing, LLC
Movant
V.

1:17-bk-01806-HWV

Cynthia Ann Schmidt
Woodrow Paul Schmidt JR
Respondent(s)

Answer

Jack Zaharopoulos,
Trustee/Respondent

ANSWER

AND NOW, this 1st day of May, 2023, the Debtors, Cynthia Ann Schmidt and Woodrow Paul Schmidt JR, by and through counsel, Dawn M. Cutaia, file this Answer to the Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtors have the funds to cure the arrears..
9. Admitted legal fees may have been incurred; all other allegations are denied.

10. This is a request for relief and no response is required; but if a response is required it is denied.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny the Motion for Relief to allow Debtors an opportunity to cure the arrears.

Respectfully Submitted,
By: /s/ Dawn M. Cutaia
Supreme Court ID 77965
Attorney for Debtor(s)
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